

EXHIBIT 6

From: Gibbs, J. Evan
Sent: Monday, February 24, 2025 1:12 PM
To: Michael Mule; Joseph Labuda; rob@mllaborlaw.com; Colleen O'Neil
Cc: Gorman, Daniel E.; Adler, Matt; Mulry, Kevin P.; Kent, Paris L.
Subject: SiteOne/Caroleo: Search Results and Forensic Protocol
Attachments: SiteOne - Additional Opposing Counsel Requested Search Terms - Volume Analysis.xlsx; SiteOne-Caroleo -- Forensic Protocol.docx

Mike –

Attached is a table showing the hit counts for each search requested by Defendants, together with a combined/deduped total. The combined volume is considerably high: 203,704 documents (213 GBs of material). These searches were of course not run across the three custodians for whom we have not collected data (Francassi, Hoffman, and Ferrante).

The estimated costs to process, host, review, and produce the materials responsive to Defendants' new proposed searches for the custodians we have collected data for are:

- Promotion of 213 GBs to review database: \$41,500
 - Hosting per month of additional 213 GBs: \$2,130/month
 - Review of 204,000 docs (including all phases: 1st pass, QC, privilege, priv. log): \$342,000
 - Production: \$2,000 (as with our prior productions, we expect the volume of responsive material to be quite low)
- Total: \$394,020 (including four months of hosting)

Next, the cost to collect, process, host, review, and produce three additional custodians (Francassi, Hoffman and Ferrante) for the original scope of terms and review that we earlier did for 24 custodians plus the new search terms from Defendants would add approximately \$76,000.

These costs are not proportional to the needs of this case. This is especially true considering the amount of searching we have already performed to date (which, again, we did with your input and using your search terms), combined with the fact that we had an approximate responsiveness rate of less than 5% within the initial documents we searched and produced. If there is some subset of materials you'd like us to consider reviewing, let us know and we are willing to meet and confer over any such requests.

We will have additional information on our text message searching this week. The process has taken longer than expected, but we will have that data shortly.

Our proposed forensic protocol is attached. It is designed to only encompass the narrow scope of review contemplated by the Court. Let us know if you have any questions or if we need to have a call to discuss.

March 13 and 14 work for us for the depositions of Vic and Don. We will issue our notices today or tomorrow.

Thank you.

J. Evan Gibbs

Partner

Direct: 404.885.3093 | Mobile: 229.425.3745

evan.gibbs@troutman.com

troutman pepper locke

600 Peachtree Street, NE, Suite 3000
Atlanta, GA 30308
troutman.com

Troutman Pepper Locke is a Mansfield Certified Plus Firm